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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

PFE ORIGINAL

Via Overnight Mail

NOV 11 1988

Central Steel Drum Co.
c/o Lewis Maslow
Metro Container Corp.
Second and Price Streets
Trainor, PA

Dear Mr. Maslow,

Your letter of November 4, 1988 states that it is intended to be a complete work plan containing all the terms and conditions contained in your correspondences dated October 6, October 11, and October 28 and my correspondences dated October 26 and November 3. You have omitted several significant elements of the above documents and altered others unacceptably. Because the required elements are all accepted by you in one or another of the above cited letters, I regard the inadequacies of your November 4 letter as clerical oversights rather than substantive disagreements. Accordingly, your work plan is conditionally approved subject to the conditions that you sign and return this letter prior to commencing work and amend your work plan to remedy the deficiencies by November 15, 1988.

The following changes must be made to your November 4 work plan:

Section 3. "Equipment Cleaning" - Add a new first sentence: All equipment being removed from the Site will be steam cleaned prior to removal.

Section 4. "Fire Safety" - Change the first sentence: Fire watch will be maintained when there is any welding, cutting, or other open flame activity.

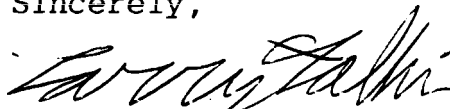
Section 5. "Recordkeeping" - Add a new last sentence to the first paragraph: All persons entering the Site will be required to sign a statement certifying that they have reviewed and understand the Site Safety Plan and have been provided appropriate personal safety equipment. Change the first sentence of the second paragraph: With regard to any type of waste leaving the property, a manifest or Bill of Lading will be kept showing . . . Delete the third sentence of the second paragraph and replace with: No bulk liquids or storage tanks, including the acid and base storage tanks and their contents, will be moved, drained or otherwise handled, unless expressly provided for in an amendment to this work plan. This prohibition does not apply to the rinsate from the steam cleaning operation which shall be handled as described in Section 3 above.

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Add a new Section 6. "Inspections" - Federal, state and local officials will be granted reasonable access to the Site for inspections. The project manager will cooperate with all such officials to resolve any concerns which arise.

Certification - Add following the phrase "considered to be a violation": of paragraph M

Sincerely,



Lawrence Falkin

cc: Alan Fischer

I have received and reviewed the above comments. I agree to consider them part of my work plan, and to ensure that all work performed pursuant to this work plan conforms with these requirements. I agree to incorporate these changes into my November 4, 1988 work plan and resubmit it by November 15, 1988.

Lewis Maslow for
Central Steel Drum Co.